

STATE OF CALIFORNIA

Energy Resources Conservation
And Development Commission

01-AFC-14

CALIF ENERGY COMMISSION

JAN 09 2002

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In the Matter of:)
)
Application for Certification)
For the Roseville Energy)
Facility (REF))
_____)

Docket No. 01-AFC-14

RESPONSE TO STAFF SOIL AND WATER
DATA REQUESTS OF DECEMBER 28, 2001

1. Introduction.

Applicant REF received Staff's Soil and Water data requests (Data Request numbers 105-156) on December 28, 2001. Applicant is obligated to inform the issuing party of any objections to the requests or information regarding the inability of Applicant to respond to the requests within the specified time for such response. Applicant fully intends to answer Staff data requests to the best of its ability, but cannot guarantee that Staff will be satisfied with the submitted response.

2. Objections.

Applicant does not now object to any of the 51 soil and water data requests. However, there may be instances where the information supplied by Applicant fails to satisfy Staff and therefore, Applicant reserves the right to object to the detail or depth of certain data requests at some future time. An example of this situation is data request 121, which requests that Applicant provide a "will serve" letter acknowledging that sufficient water will be available for the project. The request appears to dictate the contents of an agreement that has been entered into between the Applicant and the City of Roseville. Applicant will provide evidence of this agreement, but to the extent that Staff seeks revisions to this agreement, Applicant may object.

3. City of Roseville.

There are a number of requests that require that the City of Roseville provide information requested by Staff. Applicant will attempt to obtain this information and

provide it to Staff, but cannot guarantee that the information provided will satisfy Staff. For example, data request 109 requests historic waste water flows and design data for a project that is being constructed by the City of Roseville. Other requests that will require information from the City of Roseville include request numbers 110, 111, 112, 115, 116, 126 and 127. We will attempt to answer these requests, but cannot guarantee that Staff will be satisfied by the information provided. For this reason, Applicant requests a workshop following the submittal of our responses to these requests.

4. Partial Responses.

There are a number of data request responses that Applicant will submit that may not completely satisfy Staff. For example, data request 108 wants clarification of the values in a table that has been constructed by Staff. Applicant will attempt to clarify these values, but is not sure that its clarification will be in the form or will in other respects satisfy Staff. Other data requests that fall under this category are 113, 118, 122, 123, 128, 137, 141-145 and 150.

5. Conclusion.

Applicant does not object to any of the 51 soil and water data requests (Numbers 105-156). Applicant will attempt to answer all of the requests in the time specified by 20 CCR 1716. In any event, the increased amount of time for Staff review proposed by Applicant in a companion filing, will help insure that Staff will have all the information it requires in a timely manner.

Respectfully Submitted:

January 7, 2002

A handwritten signature in black ink, appearing to read "Allan J. Thompson", with a long horizontal flourish extending to the right.

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